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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
Implementation of the	)	CC Docket No. 96-98
Local Competition Provisions	)	
of the Telecommunications Act of 1996	)	

REPLY OF U S WEST, INC.

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REPLY OF U S WEST, INC.

Pursuant to 47 C.F.R. § 1.429 and the Commission's Public Notice of February 28, 2000,[1] U S WEST, Inc. ("U S WEST") submits this reply to the oppositions and comments that have been filed in response to the petitions for reconsideration or clarification of the Commission's Third Report and Order in the above captioned proceeding.[2]

I. There Is No Basis for Replacing the Four-Line Limitation to the Unbundled Local Switching Exception with a "DS-1 Interface" Limitation.

A few commenters take the position that the Commission should abandon its four-line limitation to the unbundled local switching exception and replace it with a limitation that focuses not on a customer's number of lines, but rather on the *type of facility* used to serve the customer. Specifically, they maintain that "the Commission should use the DS-1 interface itself, rather than a specific line count, as the exemption limit."[3]

As U S WEST discussed in its Response, the four-line threshold reflects a determination by the Commission that, when a customer's volume of telecommunications services reaches the

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[1] *Petitions for Reconsideration and Clarification of Action in Rulemaking Proceedings,* Public Notice, Report No. 2390 (Feb. 28, 2000) (published in Federal Register at 65 Fed. Reg. 12004 (2000)).

[2] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* Third Report and Order and Fourth Further Notice of Proposed Rulemaking, FCC 99-238, CC Docket No. 96-98 (rel. Nov. 5, 1999) ("UNE Remand Order").

[3] Cable and Wireless Comments at 5; *see also* CompTel Comments at 5; AT&T Opp. and Comments at 7.

four-line level, the customer generates sufficient revenues to make it economically feasible, at least in high density areas, for a CLEC to bear the various costs that may be associated with serving that customer without using UNE switching from the ILEC. U S WEST agrees with Bell Atlantic that the Commission should reconsider this analysis, because a CLEC that has deployed a competitive switch in an area will be able to self-provide switching for small customers in that area as well as large ones. But to the extent that the Commission takes the position that the local switching exception should continue to differentiate based on the size of the customer, the key factor plainly should be the *volume of the customer's telecommunications needs*.[4]

A technology-based standard, such as the DS-1 interface standard that these commenters have proposed, is not reliable as an indicator of a customer's volume of telecommunications usage. In some cases, customers with high volumes may be served by individual copper pairs rather than a DS-1. For example, if a customer is located very close to an ILEC's central office, the loops needed to serve that customer may be so short that it is actually cheaper to provide service via multiple copper pairs than via a DS-1. Under a technology-based standard, such a customer would be treated as "small" regardless of its high actual volume, and regardless of the fact that lack of access to the switching UNE would not "materially impair" a CLEC's ability to serve the customer. By the same token, single-line residential customers living in large multidwelling buildings may receive service via a DS-1, yet plainly are not high-volume end users. A DS-1 standard of the type that commenters appear to be proposing could make UNE switching unavailable to serve such customers, despite their limited volume. In short, the type of *facility* used to serve a customer is not a good proxy for the customer's *volume*.

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[4] *See* UNE Remand Order ¶ 291 (competition to date has been for "users with substantial telecommunications needs"); *id.* ¶ 297 ("competitors are not impaired in their ability to serve certain *high-volume* customers in the densest areas" (emphasis added)).

Moreover, as the Commission has effectively recognized in selecting a four-line threshold, the capacity served by a DS-1 is far more extensive than that necessary to make it economically feasible to serve customers without using unbundled switching. There is no merit to commenters' efforts to show that four lines is too low a threshold. Again, the relevant criterion from an impairment perspective is the customer's volume level, not whether the customer falls within some arbitrary definition of "small business." Thus, the assertion of CompTel and Sprint that "small businesses almost always use more than 3 phone lines, and many in reality use an average of between 22 and 56 lines" in no way argues for an increase in the 4-line threshold.[5] A business that uses (say) 35 lines may be "small" within whatever definition of "small business" CompTel and Sprint happen to be using, but such a business also generates sufficient revenues to make it economically feasible for a CLEC to provide service to that business through alternative switching arrangements, at least in high-density areas. Lack of access to unbundled switching would not "materially impair" a CLEC's ability to provide service to such a business.

Similarly, it is inappropriate to treat the individual loop cutover process as the dispositive issue, as some commenters seek to do.[6] Just as there should be no automatic entitlement to serve all "small" businesses with UNE switching regardless of a business's traffic volume, there should be no automatic entitlement for CLECs to avoid individual loop cutovers. The question should be whether a customer's volume is sufficient that the costs of such a cutover would not

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[5] CompTel Comments at 2 (citing Sprint Petition).

[6] *See* Cable and Wireless Comments at 4 ("[T]he DS-1 interface level is the most rational cutoff for the Commission exemption from unbundled local switching, because this is the point at which competitive carriers can avoid the cumbersome individual loop manual hot-cut provisioning process."); CompTel Comments at 4 (advocating a DS-1 threshold because "[a] DS-1 facility allows a competitive carrier to avoid the cumbersome manual hot-cut provisioning processes for individual loops").

materially impair a CLEC's ability to provide service. The Commission has determined that customers with four or more lines have sufficient volume for that purpose.[7]

II. The Commission Should Not Require the Unbundling of Calling Name (CNAM) Databases.

The Commission should grant Sprint's request to reconsider the decision to treat calling name (CNAM) databases as call-related databases subject to unbundling requirements, and should reject the oppositions of MCI WorldCom and MediaOne to that request.[8] Neither MCI WorldCom nor MediaOne disputes Sprint's central point -- namely, that there are alternative CNAM database providers.[9] Rather, they argue that the CNAM data available from alternative sources is unreliable and hence inadequate.[10]

In fact, third party CNAM database providers such as Targus and Illuminet are well established and provide accurate, complete CNAM information. Such competitors purchase listings from all carriers, including the ILECs, and thus have access to the same information as the ILECs do. Commenters' bare assertions that such third party providers may not have accurate or up-to-date data on ILEC subscribers are unfounded speculation; indeed, no party to this proceeding has presented any specific evidence demonstrating that the CNAM information offered by third party providers is in any way inadequate or unreliable. In the face of such real, currently available competitive alternatives, mere assertions by CLECs that the competitors' products are inadequate should not be sufficient to support a finding of impairment.[11]

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[7] *See* UNE Remand Order ¶ 297.

[8] MediaOne Comments at 6-7; MCI WorldCom Opp. at 12-13.

[9] *See* Sprint Pet. at 16-17; MCI WorldCom Opp. at 13 ("It is true that there are third party providers of CNAM data.").

[10] *See* MCI WorldCom Opp. at 13; MediaOne Comments at 7.

[11] Moreover, even if a particular third party CNAM provider were to offer a less attractive product -- say, by failing to update its data sufficiently often -- that would not automatically warrant a finding of impairment. Even in a fully competitive environment, some providers inevitably provide better products than others. Thus, the key question is whether there is any

Moreover, it is not the case that, without mandatory unbundled access, CLECs would not be able to access U S WEST's CNAM database. U S WEST has been providing nondiscriminatory access to its CNAM database since 1995. The only question is whether such access will be available at a TELRIC price or at a market-based price.

III. The Commission Should Not Require an ILEC To Construct a "Single Point of Interconnection" at Multi-Unit Premises.

The Commission should grant Bell Atlantic's request for reconsideration of the requirement that ILECs construct new interconnection facilities to provide requesting carriers with a "single point of interconnection" at each multi-unit location.[12] AT&T and MCI WorldCom oppose that request, arguing that requiring ILECs to perform such construction is appropriate based on the Eighth Circuit's endorsement of the Commission's conclusion in the First Interconnection Order that "the obligations imposed by sections 251(c)(2) and 251(c)(3) include modifications to incumbent LEC facilities to the extent necessary to accommodate interconnection or access to network elements."[13]

AT&T and MCI WorldCom overlook a crucial point: Pursuant to the very passage they quote, the Commission requires ILECs to modify facilities only "to the extent necessary" to accommodate access to network elements. Neither the Commission nor the courts have endorsed the idea that ILECs must construct interconnection facilities in order to make access more *convenient* for requesting carriers -- rather, ILECs must engage in such construction only where

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systematic barrier that prevents third party providers from offering CNAM information that is the functional equivalent of that offered by the ILEC. There is no such barrier. Accordingly, the market can and does provide reasonable alternatives to ILEC CNAM databases.

[12] Bell Atlantic Pet. at 13-15.

[13] MCI WorldCom Opp. at 7-8 (quoting *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996,* First Report and Order, 11 FCC Rcd 15499 (1996) ¶ 198); AT&T Opp. and Comments at 14 & n.11 (quoting *Iowa Utils. Bd. v. FCC,* 120 F.3d 753, 813 (8th Cir. 1997), *aff'd in part and rev'd in part sub nom. AT&T Corp v. Iowa Utils. Bd.,* 119 S.Ct. 721 (1999)).

necessary to make access feasible. Requiring an ILEC to engage in construction only where necessary (as opposed to merely convenient or useful) for interconnection and/or unbundled access is consistent with the Supreme Court's decision in *Iowa Utilities Board*, which held that the Act does not permit unbundled access based simply on a showing that such access would be somewhat more convenient or cheaper for requesting carriers.[14] Similarly, the D.C. Circuit recently held that section 251(c)(6), which closely tracks the language quoted by AT&T and MCI WorldCom above by requiring collocation of equipment "necessary for interconnection or access to unbundled network elements," does not permit collocation of equipment that is merely "used or useful."[15]

The construction of new, single points of interconnection at multi-unit premises might be useful or convenient for requesting carriers, but it is not remotely "necessary." A requesting carrier seeking to serve a customer at a multi-unit property where no "single point of interconnection" exists still has the option of choosing one among the property's several interconnection points and interconnecting there. Alternatively, if the requesting carrier wants to ensure that it can serve all customers of the multi-unit property from a single interconnection location rather than several, there will virtually always be a common interface point not far from the property -- typically at the Feeder Distribution Interface -- that the requesting carrier could use. The FDI interface might be marginally less convenient than a single interconnection point located directly on the property to be served, but its use could hardly be said to impair the requesting carrier's ability to provide service.

In short, as a result of the subloop unbundling requirement, a requesting carrier seeking to provide service to a multi-unit property generally has two viable options for interconnection (in

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[14] *See AT&T Corp. v. Iowa Utils. Bd.*, 119 S.Ct. 721, 734-36 (1999).
[15] *See GTE Service Corp. v. FCC*, 2000 WL 255470 (D.C. Cir. 2000) *6-7.

addition to the option of obtaining access at the serving wire center). There is no basis for requiring the ILEC to construct yet another option simply because a requesting carrier might find it somewhat more convenient or less costly than the existing alternatives.

IV. The Commission Should Not Modify Its Decision Concerning OS/DA.

U S WEST opposes those parties urging the Commission to reconsider or clarify its decision that operator services and directory assistance ("OS/DA") services need not be unbundled where the ILEC provides customized routing capability.[16] The relief that such parties have requested includes the imposition of a set of detailed regulatory hurdles that an ILEC must navigate in order to be relieved of the duty to unbundle OS/DA; the adoption of a mandatory "transition period" during which an ILEC must continue to provide OS/DA as a UNE, notwithstanding the Commission's finding that the impairment standard is not met; unbundled access to ILECs' OS/DA databases, as opposed to services; and even the outright reversal of the Commission's decision that OS/DA need not be unbundled.[17]

None of these requests has merit, for the various reasons discussed by Bell Atlantic, GTE, and SBC.[18] But beyond their individual flaws, all of the specific requests for relief on this issue ignore one crucial fact: OS/DA will continue to be available from the ILEC (as well as from third parties), regardless of the Commission's decision not to require OS/DA unbundling. As the Commission noted repeatedly in the UNE Remand Order, section 251(b)(3) requires every LEC to provide competitors with nondiscriminatory access to operator services and directory assistance.[19] In addition, section 271(c)(2)(B)(vii)(II)-(III) requires an RBOC to provide nondiscriminatory access to directory assistance and operator services in order to obtain

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[16] AT&T Opp. and Comments at 18; Sprint Comments at 4; CompTel Comments at 12.
[17] *See* AT&T Pet. at 21-23; RCN Pet.; MCI Pet. at 18-19.
[18] *See* Bell Atlantic Opp. at 13-17; GTE Comments and Opp. at 13-16; SBC Opp. at 32-36.
[19] *See* UNE Remand Order ¶¶ 442, 455, 457, 460, 464.

long distance authorization. Thus, U S WEST and other ILECs will continue to make OS/DA available to competitors; the Commission's decision not to require access to these functions as UNEs means only that the price of such OS/DA will be set by the competitive marketplace rather than by regulators. In light of this fact, most of the commenters' asserted harms, which appear to assume the *unavailability* of ILEC OS/DA, are simply moot. The requests to delay, condition, or otherwise circumvent the Commission's decision on OS/DA unbundling should be seen for what they are: An attempt to postpone for as long as possible the market-based pricing of OS/DA.

V. The Commission Should Reject AT&T's Request for xDSL-Equipped Loops.

AT&T, which steadfastly resists *any* access requirements on its cable architecture, reiterates its position that a CLEC should be permitted to use its right of access to the UNE platform ("UNE-P") to bootstrap a right of access to TELRIC-priced xDSL electronics.[20] But the xDSL-equipped loops that AT&T requests are not something that the ILEC already has and can simply turn over to a CLEC as part of the preassembled "platform." Rather, AT&T is asking that the ILEC be forced to do the work of purchasing and installing new xDSL equipment, including DSLAMs. The Commission, in declining to require the unbundling of DSLAMs, has rightly held that CLECs can and should be responsible for obtaining and installing their own such equipment.

Contrary to the claim of AT&T, there is nothing "impossible" about the burden this imposes on CLECs.[21] What AT&T really means is that it is impossible for a CLEC to install its own xDSL electronics while at the same time adhering to a strategy of relying 100 percent on the ILEC and never making any facilities investment of its own. AT&T's argument boils down to the ironic proposition that, if a CLEC has decided not to deploy any of its own facilities, it

[20] *See* AT&T Opp. and Comments at 8-10.
[21] *Id.* at 9.

should be entitled to obtain UNEs that are not available to a CLEC that is engaged in the actual task of piecing together a competitive network -- UNEs that the Commission has determined do not satisfy the impairment test. The Commission should reject AT&T's request.

VI. Other Issues

Not surprisingly, several IXC and CLEC commenters are happy to endorse the position that an ILEC should be required to condition loops at their request and on their behalf *for free*.[22] But as U S WEST made clear in its Response, using forward-looking cost models to assume away real, current expenditures has no sound economic basis, would distort competition, and would result in substantial takings liability.[23]

Some commenters also like the idea of a "grandfathering" provision to permit CLECs to continue to obtain unbundled switching to serve once-small customers regardless of how large the customers grow.[24] The proper response to this is simple: As noted in U S WEST's Response, where the impairment test ceases to be satisfied, CLECs have both the ability and the legal obligation to cease relying on UNEs.[25] Contrary to the contention of some commenters, there is no risk of any disruption of service to the customer.[26] When a customer grows to four or more lines, the CLEC serving that customer may purchase switching from another source, may offer service via resale pursuant to section 251(c)(4), or may continue to purchase switching from the ILEC at a non-TELRIC price. Significantly, quite apart from their section 251 obligations, RBOCs are required to provide unbundled access to local switching in order to qualify for interLATA relief under section 271.[27]

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[22] *See* AT&T Opp. and Comments at 16; Sprint Comments at 5-7; ALTS Opp. at 5.
[23] *See* U S WEST Response at 15-17.
[24] *See* CompTel Comments at 5-6; Cable and Wireless Comments at 5-6.
[25] *See* U S WEST Response at 6.
[26] *See* Cable and Wireless Comments at 6.
[27] *See* 47 U.S.C. § 271(c)(2)(B)(vi).

Finally, none of the commenters appear to address Intermedia's request that the Commission take further evidence on the use of density zone 1 as a factor in the local switching unbundling exception. As Intermedia noted, the density zone data that the Commission relied on in the UNE Remand Order was based solely on BellSouth, and different ILECs define density zone 1 differently. Accordingly, if the Commission is not prepared to grant Bell Atlantic's request to eliminate the density zone limitation entirely, it should at least augment the admittedly "limited evidence"[28] on which that limitation was based, and consider modifying the limitation if the evidence so warrants.[29]

Respectfully submitted,

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[28] UNE Remand Order ¶ 285.

[29] *See* U S WEST Response at 7-9; Intermedia Pet. at 16-17. The Commission also should look favorably on ILEC waivers seeking permission to adopt the same density zone 1 definition as BellSouth. *See* U S WEST Response at 8.

CERTIFICATE OF SERVICE

I, John Meehan, do hereby certify that on this 5th day of April, 2000, I caused true and correct copies of the foregoing Reply of U S WEST, Inc., to be served by first class mail, postage prepaid, or by hand* via courier, upon the following parties:

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